

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	Case Number 4:21CR138
	§	Judge Mazzant/Nowak
JOHANN PETER GEHLERT CORONADO	§	

FACTUAL BASIS

The Defendant, Johann Peter Gehlert Coronado, with the full approval and concurrence of his attorney, Dave Raben, hereby stipulates and agrees that at all times relevant to the Indictment the following facts were true and the admissions herein may be used by the Court in support of Defendant's guilty plea to Count Two of the Indictment alleging a violation of 21 U.S.C. § 963 (conspiracy to manufacture and distribute heroin, intending, knowing, and having reasonable cause to believe it would be unlawfully imported into the United States). The Defendant knowingly and voluntarily affirms his guilt and agrees that had this matter proceeded to trial, the Government, through the testimony of witnesses and other admissible evidence, would have proven every essential element of the offense alleged in Count Two of the Indictment beyond a reasonable doubt, specifically including the following facts that the Defendant acknowledges are true.

1. Johann Peter Gehlert Coronado (hereinafter "Defendant") is the same person charged in the Indictment and is knowingly and voluntarily entering a guilty plea to Count Two of the Indictment.

2. The events described in the Indictment occurred within the Eastern District of Texas and/or the extraterritorial jurisdiction of the United States and elsewhere, and Defendant knowingly and voluntarily waives any objection to venue in this Judicial District.

3. Beginning in or about 2011 and continuing thereafter through in or about May 12, 2021, Defendant knowingly and intentionally conspired, combined, and agreed with others (hereinafter the “Co-Conspirators”) to manufacture and distribute heroin, intending, knowing, and having reasonable cause to believe that the heroin would be unlawfully imported into the United States.

4. Defendant knew the unlawful purpose of that agreement.

5. Defendant joined in that agreement with the intent to further its unlawful purpose.

6. The overall scope of the conspiracy involved more than 90 kilograms of heroin.

7. Defendant knew the scope of the conspiracy involved more than 90 kilograms of heroin during his membership in the conspiracy, which quantity of heroin was both reasonably foreseeable to Defendant and part of jointly undertaken activity with the Co-Conspirators.

8. Defendant’s primary role in and actions taken in furtherance of the conspiracy included brokering, investing in, and assisting in the transport and smuggling of numerous heroin shipments from Guatemala to the United States, as well as the receipt of resulting drug proceeds and the subsequent distribution of such proceeds among the Co-Conspirators in Guatemala, the United States, and elsewhere. Among other things, Defendant assisted in arranging the movement of heroin concealed on and within various types of motor vehicles that traveled by land through Guatemala and Mexico, entered the United States at the southern border of Texas, and then proceeded on to cities along the east coast of the United States where the heroin was ultimately distributed.

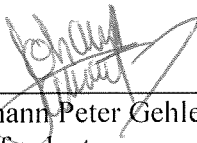
(signature page follows)

DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

I have read this Factual Basis and the Indictment, and/or had them read and explained to me in Spanish and discussed them in detail with my attorney, Dave Raben. I fully understand the content of these documents, agree without reservation that this Factual Basis accurately describes the events and my acts, and sign this document knowingly and voluntarily.

Dated: _____

3.3.23




Johann Peter Gehlert Coronado
Defendant

DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT

I am counsel for Johann Peter Gehlert Coronado. I have read this Factual Basis and the Indictment, thoroughly reviewed them with Defendant, and ensured their provisions were translated into Spanish for Defendant's benefit. Based upon my discussions with Defendant, I am satisfied that Defendant understands both documents and is knowingly and voluntarily pleading guilty and agreeing to the above stipulated facts in support of his guilty plea.

Dated: _____

3.3.23



Dave Raben
Attorney for Defendant